From: Amy Lueders
To: Jerome Perez

Subject: Re: BLM Issue in Oklahoma

Date: Saturday, April 1, 2017 4:44:20 PM

Will followup and get back to u.

Sent from my iPhone

On Apr 1, 2017, at 2:20 PM, Jerome Perez < <u>iperez@blm.gov</u>> wrote:

Any insight you can provide would be helpful? Thanks JP

Sent from my iPhone

Begin forwarded message:

From: "Benedetto, Kathleen" < <u>kathleen\_benedetto@ios.doi.gov</u>>

**Date:** April 1, 2017 at 2:56:59 PM EDT **To:** Jerome Perez < perez@blm.gov>

Subject: Fwd: FW: BLM Issue in Oklahoma

Hi Jerry,

This is the email I received via IPAA regarding Cimarex Energy Companies problem in Oklahoma. Theoretically, they initially applied for an APD in August of 2016, however I think their application coincided with BLM's consolidation move from Tulsa to Norman among other things. It's my understanding that they are awaiting approval on the archaeological stuff and Tribal consultation. Carrie Statem (SP?) is the person that is trying to get the well permitted. It sounds like she may have taken things into her own hands, talking to the tribes and contacting the State. The BLM office asked her to stop contacting people.

This involves split estate lands, private surface and federal minerals. The problem is Cimarex's lease with the surface owners contains a stipulation that they have to be drilling by April 30th or they lose the lease. They believe they need to start pad construction by the 15th of April.

Thanks for your help,

KB

----- Forwarded message -----

From: Samantha McDonald < SMcDonald@ipaa.org >

Date: Wed. Mar 29, 2017 at 3:18 PM

Subject: FW: BLM Issue in Oklahoma To: "kathleen\_benedetto@ios.doi.gov" <kathleen\_benedetto@ios.doi.gov>

From: Samantha McDonald

**Sent:** Wednesday, March 29, 2017 12:01 PM

To: 'kathy benedetto@ios.doi.gov'; 'kate macgregor@ios.doi.gov'

Cc: 'Jayme Cox'

Subject: BLM Issue in Oklahoma

Kathy and Kate:

We have a company experiencing some difficulty with BLM in Oklahoma and I was hoping you may be able to help.

As you can see from Cimarex's note below, they think it's a BLM staffing issue but are in danger of losing a lease if they can't get the agency to respond. Could you please put Jayme Cox in contact with someone at the agency who may be able to help her? Jayme (cc'd) can provide more details, if needed.

Thanks in advance for the consideration! ...And thanks for all the hard work put into the EO and Sec. Orders today.

Kindest regards,

Sam

#### Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

#### (202)857-4722 / Visit IPAA / Visit ESA Watch



From: Jayme Cox [mailto:JCox@cimarex.com] Sent: Wednesday, March 29, 2017 11:15 AM

**To:** Samantha McDonald **Subject:** need advice

Sam,

We are having an incredibly hard time with the BLM on getting an APD to drill in Oklahoma. Wondering if you are hearing the same from others? It seems they are really short of personnel, and the new field director only stayed a week! Anyway, its crazy and we are about to lose a lease if we can get it by the end of April There's way more to the story, but I wont try to explain it here. The long and short of is that Krista Johnson is out of town and I don't have any DC contacts at BLM or DOI, but I'm wondering if you've got any advice for us. I can be reached on cell below.

Thanks, Jayme

Jayme Cox

Director, Government and External Affairs

CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell



--

## **Kathleen Benedetto**

Special Assistant to the Secretary Department of the Interior Bureau of Land Management (202) 208-5934 From: <u>Lueders, Amy</u>
To: <u>Robert Pawelek</u>

 Cc:
 Aden Seidlitz; Michael Gibson

 Subject:
 Fwd: BLM Issue in Oklahoma

 Date:
 Tuesday, April 4, 2017 1:17:59 PM

Robert--Looks like AXPC has also raised concerns. I'll give you a call today

----- Forwarded message -----From: **Michael Nedd** <<u>mnedd@blm.gov</u>>

Date: Tue, Apr 4, 2017 at 10:41 AM Subject: RE: BLM Issue in Oklahoma To: Amy Lueders <a href="mailto:alueders@blm.gov">alueders@blm.gov</a>> Cc: Jerome Perez <a href="mailto:jperez@blm.gov">jperez@blm.gov</a>>

Amy,

Here is what the Jayme sent about others experiencing similar issues... That being said, we appreciate you and your team's effort on this...

In addition to the info Sam provides below, I spoke to Bruce Thompson at AXPC, and he says he has spoken recently with several other companies on a trip through the southwest, who are all having similar issues. We would appreciate any assistance you can give. I am copying our regulatory specialist, Terri Stathem on this email. Ideally, we would like to set up a conference call with you to share more specifics.

Jayme Cox

Director, Government and External Affairs

CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

Take care and have a wonderful day!:)

```
Michael D. Nedd

202-208-3801 Office

202-208-5242 Fax

mnedd@blm.gov
```

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

From: Michael Nedd [mailto:mnedd@blm.gov]
Sent: Tuesday, April 04, 2017 10:02 AM

**To:** Lueders, Amy **Cc:** Jerome Perez

Subject: Re: BLM Issue in Oklahoma

Thx Amy. I was not aware of the previous traffic and it looks like the folks in ASLM is not too.

Take care and have wonderful day! :-)))

MDN 202-208-3801

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

Sent from my mobile device, please excuse any typos.

On Apr 4, 2017, at 9:54 AM, Lueders, Amy <<u>alueders@blm.gov</u>> wrote:

per my earlier email...

----- Forwarded message -----

From: Lueders, Amy < alueders@blm.gov >

Date: Mon, Apr 3, 2017 at 9:52 AM Subject: Re: BLM Issue in Oklahoma We are aware of this issue and the OK field manager is personally engaged in resolving this issue. Their application did coincide with our move to our new location. When we became aware of this issue, the BLM folks reached out to the consulting tribes and SHPO asking for expedited review. As of Friday afternoon, we have received responses from most of the consulting tribes who have expressed no concerns. We have not yet received response from SHPO and I believe 2 tribes but we have received assurances they are expediting their review. We will continue to make calls early this week so that we can make a decision on the APD this week. I have asked my field manager to contact Cimarex's permitting person to provide a status of where we are with the process. He will be making that call today.

I'll keep you posted. Let me know if you have any questions thanks

On Sat, Apr 1, 2017 at 2:20 PM, Jerome Perez < iperez@blm.gov > wrote:

Any insight you can provide would be helpful? Thanks JP

Sent from my iPhone

Begin forwarded message:

From: "Benedetto, Kathleen" < kathleen\_benedetto@ios.doi.gov >

**Date:** April 1, 2017 at 2:56:59 PM EDT **To:** Jerome Perez < perez@blm.gov>

Subject: Fwd: FW: BLM Issue in Oklahoma

Hi Jerry,

This is the email I received via IPAA regarding Cimarex Energy Companies problem in Oklahoma. Theoretically, they initially applied for an APD in August of 2016, however I think their application coincided with BLM's consolidation move from Tulsa to Norman among other things. It's my understanding that they are awaiting approval on the archaeological stuff and Tribal consultation. Carrie Statem (SP?) is the person that is trying to get the well permitted. It sounds like she may have taken things into her own hands, talking to the tribes and contacting the State. The BLM office asked her to stop contacting people.

This involves split estate lands, private surface and federal minerals. The problem is Cimarex's lease with the surface owners contains a stipulation that they have to be drilling by April 30th or they lose the lease. They believe they need to start pad construction by the 15th of April.

Thanks for your help,

KB

----- Forwarded message -----

From: Samantha McDonald < SMcDonald@ipaa.org >

Date: Wed, Mar 29, 2017 at 3:18 PM Subject: FW: BLM Issue in Oklahoma To: "kathleen\_benedetto@ios.doi.gov" <kathleen\_benedetto@ios.doi.gov>

From: Samantha McDonald

**Sent:** Wednesday, March 29, 2017 12:01 PM

To: 'kathy\_benedetto@ios.doi.gov'; 'kate\_macgregor@ios.doi.gov'

Cc: 'Jayme Cox'

Subject: BLM Issue in Oklahoma

Kathy and Kate:

We have a company experiencing some difficulty with BLM in Oklahoma and I was hoping you may be able to help.

As you can see from Cimarex's note below, they think it's a BLM staffing issue but are in danger of losing a lease if they can't get the agency to respond. Could you please put Jayme Cox in contact with someone at the agency who may be able to help her? Jayme (cc'd) can provide more details, if needed.

Thanks in advance for the consideration! ...And thanks for all the hard work put into the EO and Sec. Orders today.

Kindest regards,

Sam

#### Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / <u>Visit IPAA</u> / <u>Visit ESA Watch</u>

<image002.jpg>

From: Jayme Cox [mailto:JCox@cimarex.com]
Sent: Wednesday, March 29, 2017 11:15 AM

To: Samantha McDonald Subject: need advice

Sam,

We are having an incredibly hard time with the BLM on getting an APD to drill in Oklahoma. Wondering if you are hearing the same from others? It seems they are really short of personnel, and the new field director only stayed a week! Anyway, its crazy and we are about to lose a lease if we can get it by the end of April There's way more to the story, but I wont try to explain it here. The long and short of is that Krista Johnson is out of town and I don't have any DC contacts at BLM or DOI, but I'm wondering if you've got any advice for us. I can be reached on cell below.

Thanks, Jayme

## Jayme Cox

Director, Government and External Affairs

## CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

<image001.jpg>

--

## **Kathleen Benedetto**

Special Assistant to the Secretary

Department of the Interior

Bureau of Land Management

(202) 208-5934

From: <u>Lueders, Amy</u>
To: <u>Mike Nedd</u>

Subject: Fwd: BLM Issue in Oklahoma

Date: Tuesday, April 4, 2017 9:55:03 AM

per my earlier email...

----- Forwarded message -----

From: Lueders, Amy < alueders@blm.gov>

Date: Mon, Apr 3, 2017 at 9:52 AM Subject: Re: BLM Issue in Oklahoma To: Jerome Perez <<u>jperez@blm.gov</u>>

We are aware of this issue and the OK field manager is personally engaged in resolving this issue. Their application did coincide with our move to our new location. When we became aware of this issue, the BLM folks reached out to the consulting tribes and SHPO asking for expedited review. As of Friday afternoon, we have received responses from most of the consulting tribes who have expressed no concerns. We have not yet received response from SHPO and I believe 2 tribes but we have received assurances they are expediting their review. We will continue to make calls early this week so that we can make a decision on the APD this week. I have asked my field manager to contact Cimarex's permitting person to provide a status of where we are with the process. He will be making that call today.

I'll keep you posted. Let me know if you have any questions thanks

On Sat, Apr 1, 2017 at 2:20 PM, Jerome Perez < <u>iperez@blm.gov</u>> wrote:

Any insight you can provide would be helpful? Thanks JP

Sent from my iPhone

Begin forwarded message:

**From:** "Benedetto, Kathleen" < <u>kathleen\_benedetto@ios.doi.gov</u>>

**Date:** April 1, 2017 at 2:56:59 PM EDT **To:** Jerome Perez <<u>iperez@blm.gov</u>>

Subject: Fwd: FW: BLM Issue in Oklahoma

Hi Jerry,

This is the email I received via IPAA regarding Cimarex Energy Companies problem in Oklahoma. Theoretically, they initially applied for an APD in August of 2016, however I think their application coincided with BLM's consolidation move from Tulsa to Norman among other things. It's my understanding that they are awaiting approval on the archaeological stuff and Tribal consultation. Carrie Statem (SP?) is the person that is trying to get the well permitted. It sounds like she may have taken things into her own hands, talking to the tribes and contacting the State. The BLM office asked her to stop contacting people.

This involves split estate lands, private surface and federal minerals. The problem is Cimarex's lease with the surface owners contains a stipulation that they have to be drilling by April 30th or they lose the lease. They believe they need to start pad construction by the 15th of April.

Thanks for your help,

#### KB

----- Forwarded message -----

From: Samantha McDonald < SMcDonald@ipaa.org >

Date: Wed, Mar 29, 2017 at 3:18 PM Subject: FW: BLM Issue in Oklahoma

To: "kathleen\_benedetto@ios.doi.gov" <kathleen\_benedetto@ios.doi.gov>

From: Samantha McDonald

**Sent:** Wednesday, March 29, 2017 12:01 PM

To: 'kathy\_benedetto@ios.doi.gov'; 'kate\_macgregor@ios.doi.gov'

Cc: 'Jayme Cox'

Subject: BLM Issue in Oklahoma

#### Kathy and Kate:

We have a company experiencing some difficulty with BLM in Oklahoma and I was hoping you may be able to help.

As you can see from Cimarex's note below, they think it's a BLM staffing issue but are in danger of losing a lease if they can't get the agency to respond. Could you please put Jayme Cox in contact with someone at the agency who may be able to help her? Jayme (cc'd) can provide more details, if needed.

Thanks in advance for the consideration! ...And thanks for all the hard work put into the EO and Sec. Orders today.

Kindest regards,

#### Sam

#### Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / <u>Visit IPAA</u> / <u>Visit ESA Watch</u>



From: Jayme Cox [mailto:JCox@cimarex.com]
Sent: Wednesday, March 29, 2017 11:15 AM

**To:** Samantha McDonald **Subject:** need advice

Sam,

We are having an incredibly hard time with the BLM on getting an APD to drill in Oklahoma. Wondering if you are hearing the same from others? It seems they are really short of personnel, and the new field director only stayed a week! Anyway, its crazy and we are about to lose a lease if we can get it by the end of April There's way more to the story, but I wont try to explain it here. The long and short of is that Krista Johnson is out of town and I don't have any DC contacts at BLM or DOI, but I'm wondering if you've got any advice for us. I can be reached on cell below.

Thanks, Jayme

Jayme Cox

Director, Government and External Affairs

CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell



--

## **Kathleen Benedetto**

Special Assistant to the Secretary Department of the Interior Bureau of Land Management (202) 208-5934 
 From:
 Lueders, Amy

 To:
 Michael Nedd

 Cc:
 Jerome Perez

Subject: Re: BLM Issue in Oklahoma

Date: Tuesday, April 4, 2017 1:23:27 PM

If you have any opportunity to point the Cimarex folks to me for a call to discuss specific concerns, I would appreciate it

On Tue, Apr 4, 2017 at 10:41 AM, Michael Nedd <<u>mnedd@blm.gov</u>> wrote:

Amy,

Here is what the Jayme sent about others experiencing similar issues... That being said, we appreciate you and your team's effort on this...

In addition to the info Sam provides below, I spoke to Bruce Thompson at AXPC, and he says he has spoken recently with several other companies on a trip through the southwest, who are all having similar issues. We would appreciate any assistance you can give. I am copying our regulatory specialist, Terri Stathem on this email. Ideally, we would like to set up a conference call with you to share more specifics.

Jayme Cox

Director, Government and External Affairs

CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

Take care and have a wonderful day!:)

Michael D. Nedd

202-208-3801 Office

202-208-5242 Fax

mnedd@blm.gov

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

From: Michael Nedd [mailto:mnedd@blm.gov]
Sent: Tuesday, April 04, 2017 10:02 AM

**To:** Lueders, Amy **Cc:** Jerome Perez

Subject: Re: BLM Issue in Oklahoma

Thx Amy. I was not aware of the previous traffic and it looks like the folks in ASLM is not too.

Take care and have wonderful day! :-)))

MDN 202-208-3801

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

Sent from my mobile device, please excuse any typos.

On Apr 4, 2017, at 9:54 AM, Lueders, Amy <<u>alueders@blm.gov</u>> wrote:

per my earlier email...

----- Forwarded message -----

From: Lueders, Amy <<u>alueders@blm.gov</u>>

Date: Mon, Apr 3, 2017 at 9:52 AM Subject: Re: BLM Issue in Oklahoma To: Jerome Perez <<u>jperez@blm.gov</u>>

We are aware of this issue and the OK field manager is personally engaged in

resolving this issue. Their application did coincide with our move to our new location. When we became aware of this issue, the BLM folks reached out to the consulting tribes and SHPO asking for expedited review. As of Friday afternoon, we have received responses from most of the consulting tribes who have expressed no concerns. We have not yet received response from SHPO and I believe 2 tribes but we have received assurances they are expediting their review. We will continue to make calls early this week so that we can make a decision on the APD this week. I have asked my field manager to contact Cimarex's permitting person to provide a status of where we are with the process. He will be making that call today.

I'll keep you posted. Let me know if you have any questions thanks

On Sat, Apr 1, 2017 at 2:20 PM, Jerome Perez < <u>iperez@blm.gov</u>> wrote:

Any insight you can provide would be helpful? Thanks JP

Sent from my iPhone

Begin forwarded message:

From: "Benedetto, Kathleen" < kathleen\_benedetto@ios.doi.gov >

**Date:** April 1, 2017 at 2:56:59 PM EDT **To:** Jerome Perez < <u>iperez@blm.gov</u>>

Subject: Fwd: FW: BLM Issue in Oklahoma

Hi Jerry,

This is the email I received via IPAA regarding Cimarex Energy Companies problem in Oklahoma. Theoretically, they initially applied for an APD in August of 2016, however I think their application coincided with BLM's consolidation move from Tulsa to Norman among other things. It's my understanding that they are awaiting approval on the archaeological stuff and Tribal consultation. Carrie Statem (SP?) is the person that is trying to get the well permitted. It sounds like she may have taken things into her own hands, talking to the tribes and contacting the State. The BLM office asked her to stop contacting people.

This involves split estate lands, private surface and federal minerals. The problem is Cimarex's lease with the surface owners

contains a stipulation that they have to be drilling by April 30th or they lose the lease. They believe they need to start pad construction by the 15th of April.

Thanks for your help,

KB

----- Forwarded message -----

From: Samantha McDonald < SMcDonald@ipaa.org >

Date: Wed, Mar 29, 2017 at 3:18 PM Subject: FW: BLM Issue in Oklahoma To: "kathleen\_benedetto@ios.doi.gov" <kathleen\_benedetto@ios.doi.gov>

From: Samantha McDonald

Sent: Wednesday, March 29, 2017 12:01 PM

To: 'kathy\_benedetto@ios.doi.gov'; 'kate\_macgregor@ios.doi.gov'

Cc: 'Jayme Cox'

Subject: BLM Issue in Oklahoma

Kathy and Kate:

We have a company experiencing some difficulty with BLM in Oklahoma and I was hoping you may be able to help.

As you can see from Cimarex's note below, they think it's a BLM staffing issue but are in danger of losing a lease if they can't get the agency to respond. Could you please put Jayme Cox in contact with someone at the agency who may be able to help her? Jayme (cc'd) can provide more details, if needed.

Thanks in advance for the consideration! ... And thanks for all the

hard work put into the EO and Sec. Orders today.

Kindest regards,

Sam

#### Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / Visit IPAA / Visit ESA Watch

<image002.jpg>

From: Jayme Cox [mailto:JCox@cimarex.com]
Sent: Wednesday, March 29, 2017 11:15 AM

**To:** Samantha McDonald **Subject:** need advice

Sam,

We are having an incredibly hard time with the BLM on getting an APD to drill in Oklahoma. Wondering if you are hearing the same from others? It seems they are really short of personnel, and the new field director only stayed a week! Anyway, its crazy and we are about to lose a lease if we can get it by the end of April There's way more to the story, but I wont try to explain it here. The long and short of is that Krista Johnson is out of town and I don't have any DC contacts at BLM or DOI, but I'm wondering if you've got any advice for us. I can be reached on cell below.

Thanks, Jayme

Jayme Cox

Director, Government and External Affairs

## CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

<image001.jpg>

--

## **Kathleen Benedetto**

Special Assistant to the Secretary

Department of the Interior

Bureau of Land Management

(202) 208-5934

 From:
 Michael Nedd

 To:
 Lueders, Amy

 Cc:
 Jerome Perez

Subject: Re: BLM Issue in Oklahoma

Date: Tuesday, April 4, 2017 10:02:09 AM

Thx Amy. I was not aware of the previous traffic and it looks like the folks in ASLM is not too.

Take care and have wonderful day! :-)))

MDN 202-208-3801

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

Sent from my mobile device, please excuse any typos.

On Apr 4, 2017, at 9:54 AM, Lueders, Amy <a leaders@blm.gov> wrote:

per my earlier email...

----- Forwarded message ------

From: Lueders, Amy < alueders@blm.gov>

Date: Mon, Apr 3, 2017 at 9:52 AM Subject: Re: BLM Issue in Oklahoma To: Jerome Perez <<u>iperez@blm.gov</u>>

We are aware of this issue and the OK field manager is personally engaged in resolving this issue. Their application did coincide with our move to our new location. When we became aware of this issue, the BLM folks reached out to the consulting tribes and SHPO asking for expedited review. As of Friday afternoon, we have received responses from most of the consulting tribes who have expressed no concerns. We have not yet received response from SHPO and I believe 2 tribes but we have received assurances they are expediting their review.

We will continue to make calls early this week so that we can make a decision on the APD this week. I have asked my field manager to contact Cimarex's permitting person to provide a status of where we are with the process. He will be making that call today.

I'll keep you posted. Let me know if you have any questions thanks

On Sat, Apr 1, 2017 at 2:20 PM, Jerome Perez < <u>iperez@blm.gov</u>> wrote:

Any insight you can provide would be helpful? Thanks JP

Sent from my iPhone

Begin forwarded message:

From: "Benedetto, Kathleen" < kathleen\_benedetto@ios.doi.gov >

**Date:** April 1, 2017 at 2:56:59 PM EDT **To:** Jerome Perez < <u>iperez@blm.gov</u>>

Subject: Fwd: FW: BLM Issue in Oklahoma

Hi Jerry,

This is the email I received via IPAA regarding Cimarex Energy Companies problem in Oklahoma. Theoretically, they initially applied for an APD in August of 2016, however I think their application coincided with BLM's consolidation move from Tulsa to Norman among other things. It's my understanding that they are awaiting approval on the archaeological stuff and Tribal consultation. Carrie Statem (SP?) is the person that is trying to get the well permitted. It sounds like she may have taken things into her own hands, talking to the tribes and contacting the State. The BLM office asked her to stop contacting people.

This involves split estate lands, private surface and federal minerals. The problem is Cimarex's lease with the surface owners contains a stipulation that they have to be drilling by April 30th or they lose the lease. They believe they need to start pad construction by the 15th of April.

Thanks for your help,

#### KB

----- Forwarded message -----

From: **Samantha McDonald** < <u>SMcDonald@ipaa.org</u>>

Date: Wed, Mar 29, 2017 at 3:18 PM Subject: FW: BLM Issue in Oklahoma To: "kathleen\_benedetto@ios.doi.gov" <kathleen\_benedetto@ios.doi.gov>

From: Samantha McDonald

**Sent:** Wednesday, March 29, 2017 12:01 PM

To: 'kathy\_benedetto@ios.doi.gov'; 'kate\_macgregor@ios.doi.gov'

Cc: 'Jayme Cox'

Subject: BLM Issue in Oklahoma

Kathy and Kate:

We have a company experiencing some difficulty with BLM in Oklahoma and I was hoping you may be able to help.

As you can see from Cimarex's note below, they think it's a BLM staffing issue but are in danger of losing a lease if they can't get the agency to respond. Could you please put Jayme Cox in contact with someone at the agency who may be able to help her? Jayme (cc'd) can provide more details, if needed.

Thanks in advance for the consideration! ...And thanks for all the hard work put into the EO and Sec. Orders today.

Kindest regards,

Sam

#### Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / Visit IPAA / Visit ESA Watch

<image002.jpg>

From: Jayme Cox [mailto:JCox@cimarex.com] Sent: Wednesday, March 29, 2017 11:15 AM

**To:** Samantha McDonald **Subject:** need advice

Sam,

We are having an incredibly hard time with the BLM on getting an

APD to drill in Oklahoma. Wondering if you are hearing the same from others? It seems they are really short of personnel, and the new field director only stayed a week! Anyway, its crazy and we are about to lose a lease if we can get it by the end of April There's way more to the story, but I wont try to explain it here. The long and short of is that Krista Johnson is out of town and I don't have any DC contacts at BLM or DOI, but I'm wondering if you've got any advice for us. I can be reached on cell below.

Thanks, Jayme

Jayme Cox

Director, Government and External Affairs

#### CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

<image001.jpg>

--

#### **Kathleen Benedetto**

Special Assistant to the Secretary Department of the Interior Bureau of Land Management (202) 208-5934 From: <u>Lueders, Amy</u>
To: <u>Robert Pawelek</u>

 Cc:
 Aden Seidlitz; Michael Gibson

 Subject:
 Fwd: BLM Issue in Oklahoma

 Date:
 Tuesday, April 4, 2017 1:17:59 PM

Robert--Looks like AXPC has also raised concerns. I'll give you a call today

----- Forwarded message -----From: **Michael Nedd** <<u>mnedd@blm.gov</u>>

Date: Tue, Apr 4, 2017 at 10:41 AM Subject: RE: BLM Issue in Oklahoma To: Amy Lueders <a href="mailto:alueders@blm.gov">alueders@blm.gov</a>> Cc: Jerome Perez <a href="mailto:jperez@blm.gov">jperez@blm.gov</a>>

Amy,

Here is what the Jayme sent about others experiencing similar issues... That being said, we appreciate you and your team's effort on this...

In addition to the info Sam provides below, I spoke to Bruce Thompson at AXPC, and he says he has spoken recently with several other companies on a trip through the southwest, who are all having similar issues. We would appreciate any assistance you can give. I am copying our regulatory specialist, Terri Stathem on this email. Ideally, we would like to set up a conference call with you to share more specifics.

Jayme Cox

Director, Government and External Affairs

CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

Take care and have a wonderful day!:)

```
Michael D. Nedd

202-208-3801 Office

202-208-5242 Fax

mnedd@blm.gov
```

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

From: Michael Nedd [mailto:mnedd@blm.gov]
Sent: Tuesday, April 04, 2017 10:02 AM

**To:** Lueders, Amy **Cc:** Jerome Perez

Subject: Re: BLM Issue in Oklahoma

Thx Amy. I was not aware of the previous traffic and it looks like the folks in ASLM is not too.

Take care and have wonderful day! :-)))

MDN 202-208-3801

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

Sent from my mobile device, please excuse any typos.

On Apr 4, 2017, at 9:54 AM, Lueders, Amy <<u>alueders@blm.gov</u>> wrote:

per my earlier email...

----- Forwarded message -----

From: Lueders, Amy < alueders@blm.gov >

Date: Mon, Apr 3, 2017 at 9:52 AM Subject: Re: BLM Issue in Oklahoma We are aware of this issue and the OK field manager is personally engaged in resolving this issue. Their application did coincide with our move to our new location. When we became aware of this issue, the BLM folks reached out to the consulting tribes and SHPO asking for expedited review. As of Friday afternoon, we have received responses from most of the consulting tribes who have expressed no concerns. We have not yet received response from SHPO and I believe 2 tribes but we have received assurances they are expediting their review. We will continue to make calls early this week so that we can make a decision on the APD this week. I have asked my field manager to contact Cimarex's permitting person to provide a status of where we are with the process. He will be making that call today.

I'll keep you posted. Let me know if you have any questions thanks

On Sat, Apr 1, 2017 at 2:20 PM, Jerome Perez < iperez@blm.gov > wrote:

Any insight you can provide would be helpful? Thanks JP

Sent from my iPhone

Begin forwarded message:

From: "Benedetto, Kathleen" < kathleen\_benedetto@ios.doi.gov >

**Date:** April 1, 2017 at 2:56:59 PM EDT **To:** Jerome Perez < perez@blm.gov>

Subject: Fwd: FW: BLM Issue in Oklahoma

Hi Jerry,

This is the email I received via IPAA regarding Cimarex Energy Companies problem in Oklahoma. Theoretically, they initially applied for an APD in August of 2016, however I think their application coincided with BLM's consolidation move from Tulsa to Norman among other things. It's my understanding that they are awaiting approval on the archaeological stuff and Tribal consultation. Carrie Statem (SP?) is the person that is trying to get the well permitted. It sounds like she may have taken things into her own hands, talking to the tribes and contacting the State. The BLM office asked her to stop contacting people.

This involves split estate lands, private surface and federal minerals. The problem is Cimarex's lease with the surface owners contains a stipulation that they have to be drilling by April 30th or they lose the lease. They believe they need to start pad construction by the 15th of April.

Thanks for your help,

KB

----- Forwarded message -----

From: Samantha McDonald < SMcDonald@ipaa.org >

Date: Wed, Mar 29, 2017 at 3:18 PM Subject: FW: BLM Issue in Oklahoma To: "kathleen\_benedetto@ios.doi.gov" <kathleen\_benedetto@ios.doi.gov>

From: Samantha McDonald

**Sent:** Wednesday, March 29, 2017 12:01 PM

To: 'kathy\_benedetto@ios.doi.gov'; 'kate\_macgregor@ios.doi.gov'

Cc: 'Jayme Cox'

Subject: BLM Issue in Oklahoma

Kathy and Kate:

We have a company experiencing some difficulty with BLM in Oklahoma and I was hoping you may be able to help.

As you can see from Cimarex's note below, they think it's a BLM staffing issue but are in danger of losing a lease if they can't get the agency to respond. Could you please put Jayme Cox in contact with someone at the agency who may be able to help her? Jayme (cc'd) can provide more details, if needed.

Thanks in advance for the consideration! ...And thanks for all the hard work put into the EO and Sec. Orders today.

Kindest regards,

Sam

#### Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / <u>Visit IPAA</u> / <u>Visit ESA Watch</u>

<image002.jpg>

From: Jayme Cox [mailto:JCox@cimarex.com]
Sent: Wednesday, March 29, 2017 11:15 AM

To: Samantha McDonald Subject: need advice

Sam,

We are having an incredibly hard time with the BLM on getting an APD to drill in Oklahoma. Wondering if you are hearing the same from others? It seems they are really short of personnel, and the new field director only stayed a week! Anyway, its crazy and we are about to lose a lease if we can get it by the end of April There's way more to the story, but I wont try to explain it here. The long and short of is that Krista Johnson is out of town and I don't have any DC contacts at BLM or DOI, but I'm wondering if you've got any advice for us. I can be reached on cell below.

Thanks, Jayme

## Jayme Cox

Director, Government and External Affairs

## CIMAREX ENERGY COMPANY

202 S. Cheyenne Ave., Suite 1000

Tulsa, OK 74103

918.560.7073 office

512.299.0680 cell

<image001.jpg>

--

## **Kathleen Benedetto**

Special Assistant to the Secretary

Department of the Interior

Bureau of Land Management

(202) 208-5934

 From:
 Amy Lueders

 To:
 Robert Pawelek

 Cc:
 Aden Seidlitz

 Subject:
 APD status

Date: Wednesday, April 12, 2017 9:04:41 PM

Robert- could you send me a short summary of where u are with the Cimarex, what steps u have taken(sundry/AAR) including a short summary of AAR-particularly any steps moving forward to improve future process and current status of APD. Thx

Sent from my iPhone

# INFORMATION/BRIEFING MEMORANDUM FOR THE ASSISTANT SECRETARY – LAND AND MINERALS MANAGEMENT

**DATE:** March 16, 2017

**FROM:** Michael Nedd, Acting Director – Bureau of Land Management (BLM)

**SUBJECT:** Overview of Applications for Permit to Drill (APDs) on BLM Land

The purpose of this memorandum is to provide information on APDs pending at BLM field offices including 1) an estimation of how many APDs will be processed within the next 90 days, 2) an explanation of why the remaining APDs will take longer than 90 days to process, 3) the estimated number of staff assigned to APDs and total vacancies, and 4) what steps can be taken to address the APD backlog. This information is based on input received from the BLM field offices during the week of February 27, 2017.

#### **BACKGROUND**

Section 366 of Energy Policy Act of 2005 (Public Law 109–58) amended section 17 of the Mineral Leasing Act (30 U.S.C. 226) to specify time requirements for decisions on APDs. The language added specifically states: "Not later than 30 days after the applicant for a permit has submitted a complete application, the Secretary shall (A) issue the permit, if the requirements under the National Environmental Policy Act (NEPA) of 1969 and other applicable law have been completed within such timeframe; or (B) defer the decision on the permit and provide to the applicant a notice (i) that specifies any steps that the applicant could take for the permit to be issued; and (ii) a list of actions that need to be taken by the agency to complete compliance with applicable law together with timelines and deadlines for completing such actions." Notwithstanding the statutory directive to make an initial determination on the APD within 30 days, the BLM is currently considering an internal goal to process APDs within 90 days for BLM's surface managed lands and 180 days when the lands are managed by another surface management agency (SMA).

#### **DISCUSSION**

Attachment 1 provides a summary of pending APDs for all of the BLM field offices with active oil and gas operations. As of January 31, 2017, the BLM had 2,802 APDs pending. Of these, 711 are anticipated to be approved within the next 90 days. The remaining 2,091 APDs are anticipated to require more than 90 days for approval due to a variety of reasons including: incomplete NEPA analysis, need for surveys, ongoing litigation, suspensions, involvement of other SMAs, lack of staff, and other factors. In terms of staff, an estimated 325 full-time equivalents are currently on-board and assigned to APDs as part of their duties. The BLM has a total of 92 APD staff vacancies.

The five BLM field offices with the highest number of pending APDs are listed below which account for 2,060 or approximately 74 percent of the total pending APDs. Also included is a breakdown of anticipated approvals in these offices of approximately 420 APDs within the next 90 days and an explanation of why the remaining 1,640 APDs will take longer than 90 days to

process. These five offices have a combined total of 146 full-time equivalent staff currently assigned to APDs and a total of 45 APD staff vacancies. The BLM's Energy, Minerals and Realty Directorate (WO-300) will work with all of the state and field offices to better understand the timeframe for processing those APDs that are anticipated to take longer than 90 days to process. As part of that coordination, within the next week we will undertake an effort to better understand additional resource needs and, to the extent possible, coordinate temporarily redirecting staff from offices where the workload has diminished.

#### 1. Casper, Wyoming

- APDs pending: 526
- Anticipated APD approvals within next 90 days: 84
- APDs anticipated requiring more than 90 days review/approval time: 442
- Delays primarily due to incomplete NEPA analysis, need for other SMA concurrence, and new or inadequately trained staff
- Estimated staff assigned to APD reviews/approvals: 15
- Total Vacancies: 0

#### 2. Vernal, Utah

- APDs pending: 506
- Anticipated APD approvals within next 90 days: 113
- APDs anticipated requiring more than 90 days review/approval time: 393
- Delays primarily due to incomplete NEPA analysis and need for other SMA concurrence
- Estimated staff assigned to APD reviews/approvals: 19
- Total Vacancies: 10

#### 3. Dickinson, North Dakota

- APDs pending: 488
- Anticipated APD approvals within next 90 days: 94
- APDs anticipated requiring more than 90 days review/approval time: 394
- Delays primarily need for other SMA concurrence, incomplete NEPA analysis, and inadequate staffing
- Estimated staff assigned to APD review/approval: 19
- Total Vacancies: 11

#### 4. Carlsbad/Hobbs, New Mexico<sup>1</sup>

- APDs pending: 388
- Anticipated APD approvals within next 90 days: 90
- APDs anticipated requiring more than 90 days review/approval time: 298
- Delays primarily due to incomplete NEPA analysis and inadequate staffing
- Estimated staff assigned to APD review/approval: 54

<sup>&</sup>lt;sup>1</sup> The Carlsbad field office also processes APDs for the Hobbs field office. The combined pending APD total for both field offices is 388 (319 from Carlsbad + 69 from Hobbs), review/approval and staffing totals reflect combined totals.

• Total Vacancies: 16

#### 5. Farmington, New Mexico

• APDs pending: 152

• Anticipated APD approvals within next 90 days: 39

• APDs anticipated requiring more than 90 days review/approval time: 113

• Delays primarily due to incomplete NEPA analysis, need for other SMA concurrence and inadequate staffing

• Estimated staff assigned to APD review/approval: 39

Total Vacancies: 8

About 595 of the pending APDs (approximately 29 percent) in these five field offices are experiencing processing delays due to the need for concurrence from other SMAs, primarily the Bureau of Indian Affairs and the U.S. Forest Service. Concurrence from these SMAs is in large part beyond the control of the BLM. Incomplete NEPA analysis is the other largest contributor for about 366 of the pending APDs backlog (approximately 18 percent). A combination of survey needs, applicant data inadequacies, and delays in necessary field work due to weather conditions (such as heavy snowfall in Utah, Wyoming and Montana-Dakota areas) also contribute to APD processing delays.

Another main factor contributing to the backlog of pending APDs is staffing vacancies, as is shown in four of the five field offices listed above. These offices are experiencing between 20% to 60% vacancy rates in key APD staff positions. That is at least twice the typical rate of turnover for the BLM, which is compounded by the hiring freeze. Some of these communities have a difficult time recruiting and retaining staff due to lack of affordable housing. Additionally, key positions such as adjudicators and Natural Resource Specialists (NRS) are dual purposed and must split their time between providing support for leasing activities and permitting. It is also important to note that the transition to build a replacement database for the fluid minerals operations, AFMSS 2, and implementation efforts for new regulations (including Onshore Orders 3, 4, and 5) compete for available staff with APD review/approval. Currently, 70 to 80 subject matter experts from these field offices are writing technical software requirements, testing new database modules, and providing bureau and operator training, while attempting to meet their home office workload demands.

Although the APD backlog diminished significantly last fiscal year due to the slowdown in new permit submittals associated with low industry demand because of market conditions, that situation is beginning to change. With the increase in prices for oil and gas over the last few months, activity and demand for new permits has increased, particularly in the Permian Basin of southeast New Mexico where up to 47 drill rigs recently moved to the area. This is approximately a 6% increase in rig count from January 2017. In comparison, according to the latest rig count from Baker Hughes, North Dakota has 36, Colorado has 26, Wyoming has 18, Utah has 5, and Montana has 1.

#### **NEXT STEPS**

The BLM is considering how best to activate and deploy strike teams to assist with APD processing for the five offices with the highest number of pending APDs. Based on the

information collected to date and preliminary conversations with these field offices, the following preliminary APD staffing recommendations are provided. As discussed above, additional coordination with state and filed office will be forthcoming to address APD workload issues in these five offices including consideration of associated NEPA delays.

The Casper field office has a need for additional Legal Instrument Examiners (LIE) and NRS personnel.

Discussions with Vernal Field Office leadership indicates that additional resources will have a negligible impact on APD processing as the backlog is primarily the result of delays from other SMAs. Also, there is very modest rig activity with five running in Utah, compared to the more active surrounding states.

The Dickinson field office is primarily facing delays due to pending correspondence from other SMAs and lack of adequately trained staff. The Dickinson field office would benefit from adjudication assistance. In the long term, filling the current 11 vacancies will help alleviate APD backlog for this office.

Carlsbad requires assistance in all areas of APD review/approval as they currently have 16 vacancies directly related to APD review/approval. This includes Petroleum Engineers, Archaeologists, Geologists, and NRSs and LIEs among other positions.

Farmington will likely need an Archaeologist, Geologist, NRS, Wildlife Biologist, and LIE staff.

#### **ATTACHMENT**

1. Breakdown of APDs Pending on BLM Land

BLM State	Total Number of	Approximate	Approximate Acres ant	icinated to take more	than 6 months to offe	or and major roason	Number of FTEs	Number of	Vacacies listed by	Additional Leasing Staff Needs	Remarks
Office	EOIs AND	Acres to be	(please enter number of			er and major reason	Assigned to Leasing	Leasing Staff		(please indicate speciality)	Remarks
		offered during	u .		, - 3,		work (pro-rated)	Vacancies		37	
	Received as of	next 6 months									
	1/31/2017		SMAs Concurrence	NEPA/RMPs	Litigation/ FOIA	Other - Please					
			SWAS CONCUTCHEC	IVEL AVIOUS	Ertigation, 1 OIA	explain reason					
	N/A	N/A	N/A		N/A	N/A	N/A			N/A	AK uses different process.
CA	0	0	N/A	N/A	N/A	N/A	2	0	N/A	N/A	No EOIs due to ongoing litigation; focus on existing development.
СО	EOIs: 82; Acres: 587,924	101,964	182,681	69,000	0	234,279 acres due to workload limitations in the FOs.	SO: 3; Royal Gorge FO: 3; Tres Rios FO:1; Northwest DO: 0.5; Colorado River Valley and Grand Junction FOs: 0.85; White River FO: 5.8	Rios FO: 2; Colorado River Valley FO:1; White	Tres Rios FO- 1 NRS & 1 Admin; Colorado River Valley FO - 1 Botanist/ Ecologist; White River -1 PE, 1 Realty Speciaist, 1 Admin		COSO staffing concerns, especially in FO, leads to NRSs that can't review EOI acres b/c diverted to APDs and other work.
ES	EOIs: 984; Acres: 110,000	3,000	20,000 - mostly U.S. Army Corps of Engineers	25,000	1,200 pending IBLA or District Court decision	60,000; Complexity of adjudication in the East requires intensive time and staff resources to complete.	SO: 12; NSDO:10; SSDO:12	10; SSDO: 4	Supervisory LLE, Fluids Minerals Lead, NRS-	Additional investment in the automated Federal mineral ownership contract.	ESO leasing different than other SOs b/c doesn't have public lands survey system. ESO uses metes/bounds, making leasing more time consuming and complex.
MT	EOIs: 510; Acres: 794,231	69,176	331, 518 - mostly U.S. Forest Service (FS)	176,250- Pending the completion of the Lewistown RMP		217,287 acres, 102,630 of which will offer in late 2017. Another 13,211 will offer in March 2018 sale and 101,445 will offer in late 2018 sales.	1.5 LLE, 1.25 NRS between all the FO's and SO. Not including 12+ FTEs in FO and SO that work on some leasing.		4-LLE; 2 LIE		Recent completed NEPA allows for EOI acres to be offered in late 2017 and 2018 sales.
NV	EOIs: 135; Acres: 1,700,000	199,694		1,205,306		250,000. Deferred acres from Dec 2016 to Dec 2017 sale for Endangered Species Act	17.25 (SO + FO)	Nevada SO;	Ely DO -1 NRS; Carson City DO and Battle Mountain DO - 2 NRS; Winnemucca DO- 1 Geo; Elko DO -1 NRS	Funding & resources i.e labor.	NVSO received about 500K acres after 1/31/17 but not included in total.
NM	EOIs: 149; Acres: 52,990	22,117	955	10, 642 (11,597 - 955 overlap)			9 FTE 100%; 23 FTE (92 FTE 25% time)	Supervisory LLE	FO: 34 - Positions, also identified on the known APD		NMSO hasn't completed adjudicating past Roswell sale b/c staff time diverted to litigation and other work.

BLM State Office	Approximate Acres	Approximate Acres to be offered during next 6 months	Approximate Acres and (please enter number of SMAs Concurrence			or and major reason  Other - Please	Number of FTEs Assigned to Leasing work (pro-rated)		Vacacies listed by Specialties	Additional Leasing Staff Needs (please indicate speciality)	Remarks
UT	EOIs: 1,000; Acres: 4,252,311	27,908	720,004, of which 3,118 is Bureau of Indian Affairs and 716,886 is FS	3,444,835 (1,984,983 for RMP+ 1,459,852 for MLPs/SG)	927	explain reason 221,075 (Tribal Consultation = 65,559; Workload= 155,516)	SO - 3; FO - 3	0	N/A	SO: 1-GIS Specialist; 1-Staff Assistant; 1-Biologist 1- NEPA Specialist	Utah doesn't track EOIs. Once the EOIs have been parceled out, parcels and acres are tracked. EOI # is a proxy. UTSO doesn't have current vacany but has leasing needs (4 FTEs). Since leasing reform and the increased workload shift to the field offices, SO staff has been reduced. UTSO feels it would improve the leasing process if the SO leasing team was re-implemented.
WY	194,512	153,593 (of which 31,924 will be offered in June 2017 and 121,669 in September 2017)		6,359 - due to Sage Grouse deferrals		34,560 acres that just came in to be offered in 2018 sales			1-LLE	104 FTF	Historically, past acres delayed significantly due to SMA concurrence (FS). WYSO considers EOIs "cleared" on 1/31/17 for 4th quarter 2017 sale prelinary parcel list.
Total	EOIs: 2,887; Acres: 7,691,968	577,452	1,255,158	4,937,392	2,127	1,036,477	~117.8 FTE	~40.5 FTE	~46 FTE (specialites vary)	~21 FTE	Total EOI acres approximately adds to acres offered in 6 months, SMA, NEPA, litigation, and other but doesn't match exactly because some acres overlap more than one reason (i.e SMA and NEPA).

Notes:

Source: SO data request; pending as of 1/31/17.

Tracking EOIs and acres varies across state offices. Developmnet of the National Fluids Lease Sale System will help standarize future tracking.

Abbreviations:

SO- state office

DO- district office

FO- field office

LLE- Land Law Examiner

LIE - Legal Instrument Examiner

NRS-Natural Resource Specialist

PE-Petroleum Engineer

PET-Petroleum Engineering Technican

Air - Air specialist

Geo- Geologist

Bio- Biologist Arch- Archeolgist

Wild Bio - Wildlife Biologist

Out Rec Plan - Outdoor Recreation Planner

Soil - Soil Specialist

Cart - Cartographer

Physc Sc - Physical Scientist

P&EC -Planning and Environmental Coordinator

Admin- Administrative Assitant

ADM - Assistant Distic Manager

State	Field Office	TOTAL APDs Pending on 1/31/2017	APDs anticipated to be approved within next 90 days	APDs anticipate	ed to require mo		days for app eeded	roval and rea	son addition	nal time is	Estimated FTEs On-board and Assigned to APDs	Known APD	Staff Vacancies
		Highlighted Rows Indicates BLM FOs with Top 5 APD backlogs		NEPA Analysis Incomplete	Waiting on Surveys	Tied to Litigation	APDs/ Leases Suspended	Other Surface Management Agencies Involved	Lack of Staff	Other*		Total Vacancies	Vacancies Listed by Specialties
AK	Anchorage	1	1								5	1	1 Natural Resources Specialist (NRS)
	Fairbanks	1		1							APDs processed by Anchorage		
	Alaska total	2	1	1							5	1	
CA	Bakersfield	26	9	0	6	0	0	6	0	5	4		
	Clear Lake Folsom	0									APDs processed by Bakersfield APDs processed by Bakersfield		
	Hollister	1	1		1						APDs processed by Bakersfield  APDs processed by Bakersfield		
	Palm Springs Coast	0			_						APDs processed by Bakersfield		
	Ridge Crest	0									APDs processed by Bakersfield		
	Ukiah	0	40	0	7	0	0	6	0		APDs processed by Bakersfield		
	California total	27	10	0	7	0	0	6	0	5	4		
СО	Cañon City	108	30 5	76 0	0	0	2	0	0	0 8	APDs processed by White River		
	Kremmling Little Snake	6	0	5	1	0	0	0	0		·		1
		49					0		-	0	APDs processed by White River		1 Logal Instruments Eversing (UE)
	San Juan/Durango	8	3	11	3	0	0	0	0	32	9	1	1 Legal Instruments Examiner(LIE)
	Uncompahgre Columbine	10	0	0	0	0	0	0 10	0	0	APDs processed by CO River Valley	1	1 Ecologist/Botanist
	Columbine Co River Valley(Glenwood)	4	2		0	0		10	0	1	APDs processed by San Juan/Durango		+
		5	5	0			0	-	-	_	o .		
	Grand Junction	17	9	0	0	0	0	0	0	0	APDs processed by CO River Valley		+
	White River		54	96	9	1	0	0	0	6 47	12	2	
	Colorado total	220		96	9	· ·	2	11	0	47	34	2	
ES	Jackson	6	3 4			3					3	1	1 NRS
	Milwaukee Eastern States total	12	7	0	0	3	0	0	0	2	1 4	1	
MT	Lastern otates total			-	-		-	-					1 Leasing, 5 Permitting, and
	Dickinson	488	94	44	10	0	0	317	0	23	19	11	5 I&E
	Great Falls	2		2							2		
	Miles City	82	0	0		10	71			1	10	1	1 Petroleum Engineer (PE)
N 10 /	Montana total	572	94	46	10	10	71	317	0	24	31	12	
NV	Battle Mountain Carson City	0									1 1		
	Elko	3		1	1				1		1	1	1 NRS
	Ely	2		2							1	1	1 NRS
	Reno	0									1		
	Tonopah	1		1							APDs processed by Reno		
	Winnemucca Nevada total	0		4	1	0	0	0	1	0	APDs processed by Reno	2	
NM	Carlebod (210)	388	90	109	27	0	0	0	93	69	54	16	1 LIE, 1 NRS, 1 PE, 1 Outdoor Recreation
IVIVI	+ Hobbs(69)		30	103	2/	Ü	Ü	S	33	63	<b>34</b>		Planner (ORP), 1 Supervisory Archaeologist, 1 Archaeologist, 1 Supervisory Mining Engineer, 1 Supervisory PE, 1 Field Manager, 1 Cartographer, 1 Geologist, 1 Environmental Protection Specialist (EPS), 1 Production Accountability Technician( PAT), 1 Soil Conservationist, 2 Petroleum Engineering Technician (PET)
	Farmington	152	39	23				56	34		39	8	1 Archeologist, 1 Supervisory Archeologist, 2 NRS, 1 Range Specialist, 1 Realty Specialist, Land Law Examiners (LLE), 1 Supervisory Realty Specialist
	Albuquerque	15	0	0	0	0	0	15	N/A	N/A	1	1	1 Geologist/mining engineer
	Roswell	5	5	0	0	0	0	0	0	0	11	2	1 Realty Specialist, 1 NRS
	Tulsa	35	15	4	0	1	0	0	15	0	8	8	2 LIE, 1 Geologist, 1 Archeologist, 1 NRS, 1 Supervisory PE, 1 Supervisory NRS, 1 Wildlife Biologist
	New Mexico total	595	149	136	27	1	0	71	142	69	113	35	
UT	Moab	43	0	22			21				6	2	1 NRS and 1 PE
	Monticello	7	0	3	4						5		

	Arizona Chrin (AZ)		2			1	1						
	Arizona Strip (AZ)	U	Ü								U		
	Cedar City	1	0								0		
	Richfield	0	0								5	2	1 NRS and 1 PE
	Salt Lake City	3	1								2	3	2 Geologists and 1 Wildlife Biologist
	Four Rivers	1	0					1			APDs processed by Salt Lake City SO		
	Price	16	7	9							5	2	1 NRS and 1 PE
	Vernal	506	113	115	31	0	4	208	0	38	19	10	1 PE, 4 NRS, 4 LIEs, 1 Archelogist
	Utah total	577	121	149	35		25	209		38	42	19	
WY	Buffalo	35	37	24	9	0	0	9	0	19	25	5	1 Wildlife Biologist, 1 Archeologist, 1 LIE, 1 PE, 1 NRS
	Casper	526	84	75	181	0	0	14	0	172	15		
	Rock Springs	3	0	0	0	0	0	0	0	3	6	2	2 NRS
	Kemmerer	14	0	9	0	0	1	0	0	4	5	3	
	Lander	11	10		1					2	6	2	1 Archaeologist, 1 LIE
	Newcastle	19	4	3	2	0	1	2	0	7	4	1	1 Archaeologist
	Pinedale	131	100					2		29	9	1	1 LIE
	Rawlins	51	39							12	11	6	
	Cody	0	0								2		
	Worland	1	1		0						4		
	Wyoming total	791	275	111	193	0	2	27	0	183	87	20	
Nationwide	Nationwide total	2,802	711	543	282	15	100	641	143	368	325	92	

<sup>\*</sup> Includes a variety of factors such as ongoing tribal consultation, reviewing reports, waiting on operator for deficiency corrections, adjustment for biological or cultural resource concerns, and adjustment for site-specific geological restrictions (Karst formation/Potash Areas of NM).

# APD TRACKING 10/10/2019

Well	Operator	IND or FED	Sec	Twn	Rng County	State	Accepted Date	10-Day Due	10-Day Sent	Eng	Geo	NRS	Wild Bio	Arch	Adj	Complete Date	30-Day Sent	Approval Status	Remarks
Debra 1-19	Apache Corp.	FED	19	16N	23W Roger Mills	ОК	06/20/13	06/29/13	06/28/13	JA	KP	CW	BP	RH	CL			AAPD	EA signed, arch & WL done, unleased river issue at end of lateral,  Doug will research
nterstate Unit 98	Chaparrel Energy LLC	FED	21	34S	43W Morton	KS	02/06/15	02/15/15	02/11/15	JA	JM	USFS	USFS	USFS	CL				Dick Bennen new agent, USFS working on SUPO (3/2016)
																			1/18/17 Colon will ask solicitor, SEND BACK?, EA signed, PAWNEE
																			WELL!, BIA "Do not Approve" email 2/18/16, shares pad with Taylor
							/ /									/= /	. 10.0 10.0 1.0		(same EA), WL/arch done, CA, Fields' relocate offer 2/26/16, leases
Pratt 5 1-32MH	Crown Energy Co	IND	5	18N	5E Payne	OK	09/25/15	10/04/15	10/05/15			CW	BP	RH		12/7/2015	1/26/2016		expired 7/9/16
Sparks 2-3 10XH Sparks 3-3 10XH	Eagle Rock Mid-Cont. Opr LLC Eagle Rock Mid-Cont. Opr LLC	IND IND	34 34	5N 5N	5W Grady 5W Grady	OK OK	09/25/15 09/25/15	10/04/15 10/04/15	10/05/15 10/05/15		JM JM	AA AA	BP BP	RH RH	CL CL				EA signed EA signed
Fillman BIA 1H-2017X	Cimarex Energy Co.	IND	20	16N	12W Blaine	OK	06/15/16	06/24/16	10/03/15		RW	TS	BP	SL	JR			AAPD	AFMSS2, EA P&EC, geospatial OK
Redman BIA 1-28H	Marathon Oil Co	IND	28	15N	11W Blaine	OK	07/07/16	07/16/16	09/15/16			TS	BP	SB		1/12/2017		AAPD	AFMSS2, EA signed, CA needed, geospatial OK
Wald Ranch Fed 1-27-22XH	Continental Res Inc	IND	27	14N	13W Blaine	ОК	07/28/16	08/06/16	09/15/16		KP	TS	ВР	SL	JR	_,,		AAPD	AFMSS2, EA, CA needed
Walker 1-9	BBR Oil Corp	IND	9	9N	1E Cleveland	OK	07/29/16	08/07/16	09/27/16	SB	RW	CW	ВР	SL	JR				AFMSS2, EA, CA needed, geospatial OK
&M BIA 1-30H	Marathon Oil Co	IND	30	15N	10W Blaine	OK	08/24/16	09/02/16	12/05/16				BP	SL	ML				AFMSS2, arch needs addendum, geospatial OK, extended 3/5/17
Coalgate 1-9/16H	Bravo Arkoma LLC	FED	5	1N	11E Coal	OK	08/30/16	09/08/16	10/06/16	SB	RW	TS	BP	SL	ML		3/17/2017		AFMSS2, no arch received, geospatial OK twice
Dutin also 4 42 /2411	Durana Antonia III C	FFD	12	4.81	105 CI	OK	00/24/46	00/00/46	10/17/16		D\A/	TC	D.D.				2/22/2017		AFMSS2, no arch received, geospatial OK <b>60-day deferral letter sent</b>
Pringle 4-13/24H	Bravo Arkoma LLC	FED	12	1N	10E Coal	OK	08/31/16	09/09/16	10/17/16	EF	RW	TS	BP	SL	ML		3/22/2017		(2nd 60-day deferral letter)
Willie Left Hand BIA 1-5H	Marathon Oil Company	IND	5	14N	10W Blaine	OK	09/01/16	09/10/16	10/04/16	SR	RW	CW	ВР	S1	JR		2/7/2017		AFMSS2, EA no arch, geospatial OK, no arch received. <b>60-day deferral.</b> Respond by 4/6/17.
Wille Left Halla BIA 1-3H	Warathon On Company	IND	,	7414	10W Diame	OK	05/01/10	03/10/10	10/04/10	30	11.00	CVV	Di	JL	JIV		2///2017		AFMSS2, EA no arch/bio, arch reviewed 10/26. 60-day deferral letter
Perine BIA 1H-3229X	Cimarex Energy Co.	IND	32	16N	12W Blaine	OK	09/01/16	09/10/16	10/25/16	FF	RW	CW	ВР	SL	ML		3/15/2017		sent (2nd 60-day deferral letter)
	5 <b>67</b> 5 5						55,52,25		=0, =0, =0								-, -, -		AFMSS2, EA no arch, geospatial OK, no arch received, shares pad with
Old Bear Woman BIA 1-13H	Marathon Oil Company	IND	13	14N	12W Blaine	ОК	09/03/16	09/12/16	11/22/16	JA	RW	CW	GT	SL	JR		3/14/2017		Turtle Woman well. 60-day deferral for NEPA
																			AFMSS2, EA no arch/bio, geospatial OK, no arch received. 60-day
Hicks BIA 1-13/12XH	Marathon Oil Co	IND	13	13N	12W Blaine	OK	09/09/16	09/18/16	10/17/16	JA	RW	CW	GT	SL	JR		3/14/2017		deferral for NEPA
Perine BIA 1-32H	Cimarex Energy Co.	IND	32		12W Blaine	OK	09/09/16	09/18/16	12/05/16		KP		GT	EK	ML				AFMSS2, EA no arch/bio, arch reviewed 10/26, geospatial OK
ce Trust BIA 1-2H	Marathon Oil Co	IND	2	14N	11W Blaine	OK	09/14/16	09/23/16	12/05/16	SB	RW	CW	GT	SL	ML				AFMSS2, EA no arch, geospatial OK, no arch received
5	Marries O'l Co	INID	40	4 4 5 1	4004/ 51 :	014	00/44/46	00/22/46	04 /05 /47	6.5	D14/	0.47	<b>6</b> -	<u>.</u> .					AFMSS2, EA no arch, geospatial OK, no arch received, needs business
Furtle Woman BIA 1-18H	Marathon Oil Co Bravo Arkoma LLC	IND FED	13	14N	12W Blaine	OK	09/14/16	09/23/16 09/24/16	01/05/17 11/10/16		RW RW		GT	SL CL	JR		2/16/2017		site lease, shares pad with Old bear woman well
Pringle 5-13/24H	BIAVO AIROITIA LLC	FED	12	1N	10E Coal	OK	09/15/16	09/24/10	11/10/16	28	KVV	TS	GT	SL	ML		3/16/2017		AFMSS2, EA no arch, no arch received, geospatial OK AFMSS2, no arch received 60-day deferral letter sent (2nd 60-day)
Pringle 6-13/24H	Bravo Arkoma LLC	FED	12	1N	10E Coal	OK	09/20/16	09/29/16	11/02/16	SB	RW	TS	GT	SI	ML		3/22/2017		deferral letter)
Shepard BIA 1H-0805X	Cimarex Energy Co.	IND	5		12W Blaine	OK	09/22/16	10/01/16	10/17/16				GT	SL	•		3,22,2017		AFMSS2, EA, arch recd 11/7
	5 <b>67</b> 5 5							.,.,	-, , -										AFMSS2, EA no arch/bio, geospatial OK, arch recd 11/7. 60-day
Everage BIA 1H-0706X	Cimarex Energy Co. (Devon)	IND	7	15N	12W Blaine	ОК	09/22/16	10/01/16	10/25/16	EF	RW	CW	GT	SL	ML		3/15/2017		deferral sent (2nd 60-day deferral letter)
Temple BIA 1H-1102X	Cimarex Energy Co. (Devon)	IND	11	16N	12W Blaine	OK	09/22/16	10/01/16	11/03/16	EF	RW	CW	GT	SL	ML				AFMSS2, EA no arch/bio, geospatial OK, no arch received
															_				AFMSS2, no arch received 60-day deferral letter sent (2nd 60-day
Heap of Hairs BIA 1-14H	Marathon Oil Co	IND	14	14N	10W Canadian	OK	09/26/16	10/05/16	12/20/16	SB	RW	TS	GT	SL	JR		3/22/2017		deferral letter)
			_			_								_					AFMSS2, EA no arch, no arch 60-day deferral letter sent (2nd 60-day
Coalgate 2-8/17H	Bravo Arkoma	FED	5	1N	11E Coal	OK	10/25/16	11/03/16	11/10/16		RW		GT	SL	ML		3/22/2017		deferral letter)
erry BIA 1311 1-5-8MXH	Marathon Oil Co	IND	8		11W Blaine	OK	10/27/16	11/05/16 11/12/16	11/15/16	_	RW	TS	GT	SL	ML				AFMSS2, EA no arch, no arch, geospatial OK
Hines Federal 1H-0235X Fom BIA 1311 1-17-8MXH	Cimarex Energy Co. Marathon Oil Co	FED IND	2 و	10N 13N	8W Grady 11W Blaine	OK OK	11/03/16 11/15/16	11/12/16	11/21/16		RW RW	CW	GT GT	SL EK	ML ML		3/22/2017		no arch (recd 12/16)  60-day deferral letter sent (2nd 60-day deferral letter)
ΙΟΙΙΙ DIA 1311 1-1/-ΟΙΥΙΛΠ	iviai attioii Oii Co	IND	٥	TOIN	TIAM DIGILIE	UK	11/15/10	11/24/10	11/21/10	C.F	L VV	TS	OI.	EK	IVIL		3/22/201/		3160-3 and plats had wrong well name. 10-day was sent out 1/24 to address wrong well name only. 2/8/17 correct well name was sent on 3160-3, still wrong on lease plat and 1-mile radius. 60-day deferral for
anice BIA 2H-2623X	Cimarex Energy Co.	IND	23	16N	13W Blaine	ОК	11/17/16	11/26/16	01/24/17	Λ.	RW	AC	GT	EV	CI		3/23/2017		NEPA/Arch.

# APD TRACKING 10/10/2019

Well	Operator	IND or FED	Sec	Twn	Rng County	State	Accepted Date	10-Day Due	10-Day Sent	Eng	Geo	NRS	Wild Bio	Arch	Adj	Complete Date	30-Day Sent	Approval Status	Remarks
Cox 1-7H	Council Oak Res LLC	IND	18	17N	13W Blaine	OK	11/30/16	12/09/16	01/17/17	EF I	RW	AC	GT	EK	W		3/2/2017		60-day deferral for NEPA/arch. Need to respond by 5/1/17
Cox 1-8H	Council Oak Res LLC	IND	18	17N	13W Blaine	OK	12/09/16	12/18/16	01/19/17	EF I	RW	AC	GT	EK	CL		3/2/2017		60-day deferral for NEPA/arch. Need to respond by <b>5/1/17</b>
Hoile 1H-25W	Newfield Prod Co	IND	36	16N	11W Blaine	OK	12/12/16	12/21/16	02/08/17	AJ	SC	AC	GT	EK	CL		2/22/2017		Initially submitted wrong plats, APD was returned 12/15/16 and resubmitted 1/12/17. Waiting for Op to address def. 3/23/17 operator requested ext. til 5/4/17 to get operator rights from Conoco.
Christensen 22 15-16N-12W 1HX	Devon Energy Prod Co	IND	23	16N	12W Blaine	ОК	12/21/16	12/30/16	12/31/16	EF	SC	TS	GT	EK	CL		2/22/2017 4/4/2017		Easton Miller. 45-day deferral for NEPA/arch. Need to respond by Second deferral sent 4/4, 60-day deferral for NEPA/arch.
																			60-day deferral for NEPA/arch, no WMP needed. Need to respond by
Ear Rings 1-15H	Council Oaks Res LLC	IND	15	17N	13W Blaine	OK	01/03/17	01/12/17	01/25/17	AJ I	RW	AC	GT	EK	CL		3/8/2017		5/7/17
Berryman Shrewder Trust 2H-7	Le Norman Operating LLC	FED	18	17N	22W Ellis	OK	01/19/17	01/28/17	01/30/17	AJ I	RW	TS	GT	EK	CL				WMP needed. 2nd deficiency letter sent 3/21/17.
								00/01/1=	/ /								0/11/0017		Brenda Baker. 60-day deferral for NEPA/arch. Need WMP. Lease
Cope 23_14-19N-16W 1HX	Devon Energy Prod Co	IND	26	19N	16W Blaine	OK	01/26/17	02/04/17	02/02/17	EF	RW	TS	GT	EK	CL		3/14/2017		expires 8/26/17  May pood to forward took from TS to CW 60 day deferred for NEDA
Wigington BIA 1-5H	Marathon Oil Co	IND	5	14N	11W Blaine	ОК	01/27/17	02/05/17	02/02/17	EE I	RW	TS	GT	EK	CL		3/17/2017		May need to forward task from TS to CW. 60-day deferral for NEPA and arch. Eng waiting on WMP.
Wigington BIA 1-311	Warathon On Co	IND	J	1411	TIVV Dianie	OK	01/2//1/	02/03/17	02/02/17	- '	X V V	13	G1	LK	CL		3/11/2017		May need to forward task from SB to AJ. 90-day deferral for NEPA and
Rhino 8 5-14N-9W 1 HX	Devon Energy Prod Co	IND	8	14N	9W Canadian	ОК	02/16/17	02/25/17	03/02/17	SB	SC	TS	GT	EK	CL		3/22/2017		arch. Eng waiting on WMP.
	Devon Energy Prod Co	IND	31	17N	11W Blaine	ОК	03/01/17	03/10/17	03/09/17	EF I	_	CW	GT	EK	JR		3/14/2017		90-day deferral for NEPA/WMP
Londyn BIA 1411 1-9MH	Marathon Oil Co	IND	9	14N	11W Blaine	OK	03/01/17	03/10/17	03/09/17	AJ I	RW	CW	GT	EK	JR				Geospatial ok
Sisson 1-25H	Council Oak Res LLC	IND	25	17N	13W Blaine	OK	03/03/17	03/12/17	03/09/17	JA	RW	CW	GT	EK	JR				
Pierce 7_6-15N-11W 1HX	Devon Energy Prod Co	IND	18	15N	11W Blaine	OK	03/06/17	03/15/17	03/13/17	EF I	RW	CW	GT	EK	JR				
Marc Federal 2-5-8XH	Continental Res Inc	IND	5	13N	12W Blaine	OK	03/08/17	03/17/17	03/15/17	AJ I	RW	CW	GT	EK	JR				
Porcupine 34_27-16N-12W 1HX	Devon Energy Prod Co	IND	34	16N	12W Blaine	OK	03/10/17	03/19/17	03/16/17	EF	SC	CW	GT	EK	CL				Brenda Baker.
																			Requesting suspension of operations & production from Santa Fe due
USA 2 I1H	Statoil Texas Onshore Properties	FED	N/A	N/A	N/A Live Oak	TX	03/10/17	03/19/17	03/22/17	JA	SC	CW	GT	EK	CL				to BOR hold-up.
																			Requesting suspension of operations & production from Santa Fe due
USA 2 I2H	Statoil Texas Onshore Properties	FED	N/A	N/A	N/A Live Oak	TX	03/10/17	03/19/17	03/22/17	JA	SC	CW	GT	EK	CL				to BOR hold-up.
Willow 12_1-15N-12W 1 HX	Devon Energy Prod Co	IND	12	15N	12W Blaine	OK	03/15/17	03/24/17	03/28/17	EF	SC	CW	GT	EK	CL				
Wheeler BIA 1-25H	High Mark Energy LLC	IND	24		11W Blaine	OK	03/17/17	03/26/17	03/22/17			AC	GT	EK	CL				RSES. WMP submitted and approved.
Cheetah 32_29-15N-10W 1HX	Devon Energy Prod Co	IND	32		10W Blaine	OK	03/21/17	03/30/17	03/29/17				GT	EK	CL				
Enlow 1-8-5XH	Council Oak Resources LLC	IND	17		12W Blaine	OK	03/21/17	03/30/17	03/28/17				GT	EK					RSES. WMP submitted and approved.
The Moon 18-13N-7W 1H	Devon Energy Prod Co	IND	18	13N	7W Blaine	OK	03/22/17	03/31/17					GT						
Xxx Xxx	Xxx	XXX	Χ	Χ	X Xxx	XX	X/X/XXXX	#VALUE!	X/X/XXXX	XX	XX	XX	XX	XX	XX				XXX

52 as of 10/10/19